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**From:** Nick Kozma [nkozma@cslbos.com]  
**Sent:** 10/17/2013 5:34:11 PM  
**To:** 'marine-eca@epa.gov' [marine-eca@epa.gov]; 'helpdesk@epacdx.net' [helpdesk@epacdx.net]  
**CC:** Nick Kozma [nkozma@cslbos.com]  
**Subject:** m/v CSL Tecumseh - LSFO Fuel Oil Non-Availability Report

**Importance:** High

Good day.

Please see below a Fuel Oil Non-Availability Report being submitted due to a recent circumstance of LSFO fuel non-availability at the Port of San Francisco. I have tried to submit electronically but the site is still down due to the recent government shutdown.

m/v CSL Tecumseh was previously in the Port of San Francisco where we had planned on putting ECA-compliant LSFO onboard. During her call, the LSFO bunker barge was blocked and could not get to the ship to re-fuel. We had no choice but to sail the vessel and hope that she will have enough LSFO onboard to reach the next US port (Rainier, OR). We think she will have adequate ECA fuel onboard (approx. 45 mt remaining), but should weather interfere and she lose time she would need to switch back to her non-compliant HSFO supply until she reaches Rainier, OR. We believe this would happen at about 162 nm from Rainier. Since this is not confirmed, we are just submitting this as a preemptive notice that we could be entering the ECA with no LSFO onboard. We will rescind the below report if the vessel is able to make it.

1. Vessel: **m/v CSL TECUMSEH**
2. Flag: **Bahamas**
3. IMO#: **9600994**
4. Description of voyage plan / schedule:
  - Port of origin: **San Francisco, CA**
  - Port of destination: **San Marcos Island, Mexico**
  - First US port of arrival: **Rainier, OR**
5. Date of first notice vessel would transit US ECA: **14 Oct 2013**
6. Location of vessel when notified it would transit US ECA: **San Francisco Bay, CA**
7. Date / time expect to enter and exit US ECA: **Entering 0800/25 Oct-Exiting (pending loading prospects) ~PM/31 Oct.**
8. Projected days ships m/e will be in operation within the US ECA: **3.38 days.**
9. Description of actions taken to obtain 1% LSFO prior to entering US ECA: **Compliant fuel was not available at planned bunker port (San Francisco) because the bunker barge was blocked by another ship from delivering to the CSL Tecumseh, so the ship had to sail without lifting the ECA-compliant bunkers.**
10. Operational constraints to use available compliant fuel: **N/A**
11. Availability status of compliant LSFO at first US port of call / plans to obtain such fuel: **We intend approx. 800 mt LSFO at first US ECA port of opportunity, which will be Rainier, OR (port of unloading).**
12. Names of all US ports visited within US ECA in the last 12 months (include name of port, dates visited, and whether the vessel used compliant fuel): **This vessel is on a steady run into the San Francisco Bay area, Rainier, OR, and Tacoma, WA all of which she has complied with the ECA regulation since her delivery to CSL in May 2013.**
13. Fuel Oil Non-Availability Reports previously submitted within the past 12 months (provide dates and ports previously visited while using non compliant fuel): **N/A. This ship has never been in violation of the ECA regulation.**
14. Relevant contact information:
  - Vessel Master:  
Capt. Vadym Urizchenko  
Tel.(716) 261-2301  
Tel.(716) 261-2300

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e-mail: [csl.tecumseh@gtships.com](mailto:csl.tecumseh@gtships.com)  
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- Ship Operator:

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- Agent (Rainier, OR):

General Steamship – PDX  
Phone: (503) 228 7214  
Fax: (503) 225 9310  
Email: [pdxops@gensteam.com](mailto:pdxops@gensteam.com)

- Ship Owner

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- Designated corporate official authorized to answer additional questions relating to claims of fuel oil non-availability, or actual ship operator:

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Please feel free to contact me if you require further information. I will also advise the agents and local USCG representatives prior to her 96 hr eNOA.

Brgds,  
Nick Kozma

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